

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of

Creation of a Low Power Radio Service

MM Docket No. 99-25

To: The Commission

REPLY COMMENTS

The Colleges of the Seneca, the FCC licensee of public radio station WEOS and translator station W212BA, both Geneva, NY, and applicant for a new facility in Ithaca, NY, submit these Reply Comments in the above-referenced proceeding on LPFM.

We strongly support the initial Comments in this proceeding filed by the Public Radio Regional Organizations (the "PRROs"), the Station Resource Group ("SRG"), the Corporation for Public Broadcasting ("CPB"), and National Public Radio ("NPR")

Based on our understanding of the initial Comments of the public radio industry groups, LPFM will adversely affect public radio, in that it will result in (i) the introduction of an intolerable level of new interference throughout the FM band, with public radio bearing the brunt of the effects of new interference because of its typical program modulation; (ii) jeopardization of the substantial federal, state and private investment in public radio; (iii) an unknown (and unknowable) impact on public radio conversion to digital audio broadcasting; (iv) loss of existing public radio FM translator and satellite/repeater service; (v) loss of existing public radio service outside protected contours; and (vi) potential loss of subcarrier services, particularly radio reading services for the print disabled.

In the specific case of our licenses, the issues of interference are already of great concern, due to existing encroachment of our public radio audience, by the introduction of translators under current rules. Due to the terrain of this area, our relatively rural coverage area, and the nature of our program service, many listeners depend upon us for their first public radio service, many outside the protected contour of our station. In addition, the potential loss of subcarrier service could have a devastating effect upon the print disabled. In our case, we have received federal grants to support our expansion into unserved areas, and to add service to new areas that now receive public radio outside our protected contour, in some cases, for the first time. We see the establishment of an lpfm service, as proposed, as counter productive to the federal interest already invested in the public radio service

We urge the Commission not to sacrifice our public radio stations and our public radio listeners for the illusory benefits of LPFM. We urge the Commission to look for alternate ways (outside the FM band) to accommodate the proponents of LPFM, if it believes any such accommodation

is

appropriate. We ask the Commission to pay heed to the Comments of our public radio industry groups (PRROs, SRG, NPR, and CPB) and to treat those views as our views in this proceeding. We request that the Commission review with care the "listening tests" on the CD ROMs submitted with NPR's Comments - those listening tests document the intolerable interference that LPFM will cause if authorized as proposed in this proceeding.

We state unequivocally our firm belief that the record in this proceeding does not support the creation of LPFM in the FM radio band.

Respectfully Submitted,

Michael R. Black

By: WEOS, Colleges of the Seneca

Title: General Manager

Date: 8/28/99